

Section 1

BNP Paribas S.A.

Statement related to the disclosure's obligations relating to Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (SFDR)

BNP Paribas Group's mission is to contribute to responsible and sustainable growth by financing the economy and advising clients according to high ethical standards. The Group's Corporate Social Responsibility (CSR) policy is one of the main components of this approach. In line with the United Nations' Sustainable Development Goals (SDGs), it is based on four pillars (economic, social, civic and environmental) that reflect its CSR challenges, as well as the Group's concrete achievements.

In 2019, BNP Paribas Group has published its corporate purpose, a text which was endorsed by the BNP Paribas Executive Committee, based on three texts resulting from a work with many different employees. These include: the Shared Convictions (Mission and Vision), the Code of conduct and the Engagement Manifesto.

Moreover, BNP Paribas Group has been committed for many years by setting itself additional obligations in several sensitive sectors through:

- Financing and investment policies in the following sectors: agriculture, palm oil, defence, nuclear energy, paper pulp, coal energy, mining and non-conventional hydrocarbons... (for an updated list of policies, please see the [link](#));
- A [list of excluded goods and activities](#) such as tobacco, drift nets, the production of asbestos fibres, products containing PCBs (polychlorinated biphenyls), or the trading of any species regulated by the CITES convention (Convention on international trade in endangered species of wild fauna and flora) without the necessary authorisation;

Restriction lists which define the level of monitoring and constraint applied to companies which do not fully meet the Group's CSR requirements.

In line with the United Nations' SDGs, the BNP Paribas Group actively participates in designing and implementing long-term social and environmental solutions within the framework of both the Principles for Responsible Investment (PRI) and the Principles for Responsible Banking (PRB).



Scope of the statement

The information specified in the statements apply to BNP Paribas SA and its branch in Germany.

Within BNP Paribas SA, discretionary management activities are mainly carried out by the BNP Paribas Wealth Management business line, which concerns BNP Paribas BCEF and the German branch of BNP Paribas S.A. BNP Paribas BCEF's corporate activity also included discretionary management between 2023 and Q3 2025 but all mandates have been terminated in Q3 2025.

Investment advice is provided by BNP Paribas SA only through its BNP Paribas Wealth Management business line.

The reference to BNP Paribas Wealth Management business line refers to the Banque Privée France Private Banking & Wealth Management in Germany.

Note that specific information can be inserted in the local statements to cover the local specificities of the different business lines.

Section 2

Information about BNP Paribas S.A. policy on integration of sustainability risks in investment decision-making process and investment or insurance advice

Sustainability risk means an environmental, social or governance (ESG) event or condition that, if it occurs, could cause actual or potential material negative impact on the value of the investment.

BNP Paribas S.A., as financial advisor and as financial market participant, takes into account, when possible, sustainability risks when selecting or recommending investment products to its clients.¹

A long-term increase of these “outside-in” sustainability risks is to be expected, in particular due to climate change. Therefore, in addition to the risk/return analysis BNP Paribas S.A. considers, as much as possible, “outside-in” sustainability risk.

First of all, BNP Paribas S.A. takes sustainability risks into account, through the application of the relevant sector policies to securities, bonds and investment products fully manufactured by BNP Paribas S.A. and its subsidiaries. With respect to investment products manufactured by other asset managers or product manufacturers, the information on their sector policies is collected and taken into consideration through the proprietary Clover evaluation of BNP Paribas S.A.

After the application of this first filter to the investable universe, BNP Paribas can use its proprietary Clover evaluation assessing the responsibility level of financial instruments of each asset class. On top of regulatory information when available, it offers an insight on how products take into account sustainable development challenges. It is being deployed within the recommended investment universe of BNP Paribas Wealth Management, attributing a rating of 1 to 5 Clovers to the recommended products it analyses. The evaluation allows BNP Paribas to identify as much as possible how sustainability risks are considered by each product. The Clover rating resulting from the evaluation can be taken into account in investment decisions or when advising clients on financial instruments or insurance products. More information on the methodology is available on [BNP Paribas Wealth Management’s website](#).

Five methodologies are deployed:

- One for equities and corporate bonds;
- One for sovereign bonds;
- One for funds and ETFs;
- One for alternative funds;
- And one for Private Assets.

¹ For insurance products distributed by BNP Paribas ERE to its corporate clients, the sustainability risks and principal adverse sustainability impacts are taken into account by BNP Paribas Cardif when designing these products. Please refer to BNP Paribas Cardif statement.



For each asset class analysed, and for BNP Paribas' products as well as for those of other asset managers or producers of financial instruments, the experts of the Sustainability Office of BNP Paribas Wealth Management, with the product experts concerned, evaluate the sustainability risks of financial instruments thanks to the Clover evaluation. The Clover rating reflects the sustainability risks assessed: the lower the Clover rating, the higher the potential sustainability risk.

The Clover evaluation enables BNP Paribas S.A., as a financial advisor and as a financial market participant, to identify investment products for which the occurrence of an event or situation, in the environmental, social or governance field, could have a real or potential negative impact on the value of these products.

However, investment products with a high level of sustainability risk can be invested or recommended to clients if they meet the client's other investment objectives, investor profile or diversification needs.

Finally, BNP Paribas S.A. commits maintaining an open, constructive relationship with its external stakeholders (customers, suppliers, sustainable investors, advocacy NGOs, etc.) to achieve three objectives: anticipate change in its business lines and improve products and services, optimise risk management and have a positive impact on society and on the environment.

Section 3

Information about BNP Paribas S.A. policy as financial adviser on considering the Principal Adverse Impacts of investment advice on sustainability factors²

BNP Paribas S.A. sustainability classification and selection of the financial instruments:

The classification and the selection of financial instruments regarding Principal Adverse Sustainable Impacts (PAI) rely on various methodological approaches according to the type of financial instrument:

- a. Funds and structured products:** based on the PAI published by the asset managers or by the manufacturers of structured notes, a financial instrument is considered as taking into account the environmental or social category of principle adverse sustainable Indicators (PAI) if one at least of the mandatory environmental or social PAI³ is taken into account.
- b. Equities and bonds:** based on the data feed of BNP Paribas Asset Management, the sustainability of the financial instruments is rated taking into account the ESG criteria of the activity and practice of the company, as well as the ESG criteria of the sector it operates in. In its proprietary ESG scoring framework, BNP Paribas Asset Management takes into account the mandatory PAI, cf. Appendix 1 of the SFDR Disclosure Statement detailing for each PAI how it is embedded within the scoring methodology.

The analysis, realised by BNP Paribas S.A. as financial advisor, allows the classification, when possible, of financial instruments according to MIFID definition of “sustainability preferences”⁴.

BNP Paribas S.A. when providing advice on equities and bonds, considers and addresses the following Principal Adverse Impacts when advising on sustainability factors:

- PAI number 10 by relying on several international standards that BNP Paribas adheres to, in particular: The UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises OECD Principles for Multinational enterprises which may lead to the exclusion of companies active in certain sectors. PAI number 10 is considered and addressed by BNP Paribas Asset Management Responsible Business Conduct which evaluates and excludes companies exposed to issuers who are in breach with UNGC Principles and/or OECD Multinational Enterprises guidelines.

² SFDR Delegated regulation art.11

³ PASI being listed in table 1 of Appendix 1 of SFDR RTS.

⁴ Article 2(7) MIFID Delegated Regulation 2017/565



- PAI number 14, in particular: Exposure to controversial weapons. The following controversial weapons conventions are taken into account to consider and address PAI 14: Oslo Convention on Cluster Munitions (2008) and Ottawa Treaty on Landmines (1999), Biological and Toxin Weapons Convention (1972), Chemical Weapons Convention (1993). All investee companies involved in the manufacturing or the selling of controversial weapons are excluded.

BNP Paribas S.A., when providing advice on funds and ETFs of third-party asset management companies, considers and addresses the following PAI:

- PAI number 10, for the part of clients' portfolios with sustainability preferences according to MiFID II, by relying on several international standards that BNP Paribas adheres to, in particular: UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. For this purpose, BNP Paribas S.A. reviews European ESG Templates (EET) provided by Asset Management companies to ensure PAI number 10 is considered. In case of non-consideration, BNP Paribas S.A. engages in a dialogue with the asset management company that could lead to a divestment.
- PAI number 14 for, the part of clients' portfolios with sustainability preferences according to MiFID II, in particular: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons). For this purpose, BNP Paribas reviews European ESG Templates (EET) provided by Asset Management companies to ensure PAI number 14 is considered. In case of a non-consideration or an exposure the financial product will be excluded.

For the avoidance of doubt, BNP Paribas does not at this stage consider on derivative instruments and on Article 6 SFDR financial products the Principal Adverse Impacts on sustainability factors.

For Reception and Transmission of Orders (RTO) and/or reverse solicitations the client does not receive any advice and no investment recommendations. In this case BNP Paribas S.A. does not consider the above-mentioned PAIs.

Section 4

Information about BNP Paribas S.A. policy as financial adviser on considering the Principal Adverse Impacts of insurance advice on sustainability factors⁵

Insurance companies are manufacturers of life insurance contracts that are subject to SFDR disclosure requirements. In particular, for Cardif Assurance Vie and Cardif Retraite, contracts distributed by BNP Paribas S.A., you can refer to their [SFDR statements](#).

As a financial adviser, BNP Paribas S.A. relies on the information provided by insurance companies on their general funds and on their unit-linked, as per SFDR classification, to take into consideration PAIs.

Regarding the Euro Funds of Cardif Assurance Vie and Cardif Retraite, they consider Principal Adverse Sustainability Impacts: details are available on [BNP Paribas Cardif CSR web page](#).

At BNP Paribas level, as a distributor, the classification and the selection of unit-linked regarding Principal Adverse Sustainable Impacts by BNP Paribas is based on:

- **For underlying options based on funds, ETFs, structured products:** the Principle Adverse Sustainable Indicators provided by the manufacturers to BNP Paribas, a unit-linked being considered as taking into account the E, S or G category of Principle adverse sustainable Impact (PAI) if at least one of the mandatory PAI of the E, S or G category is taken into account.
- **For unit-linked based on equities and bonds:** the methodology relies on data from BNP Paribas Asset Management. It includes an ESG scoring of instruments that considers the ESG criteria of the company's activity and practice, as well as the ESG criteria of the sector and region it operates in. Mandatory PAIs are also taken into account in this assessment methodology, cf. Appendix 1 Mandatory corporate indicator of [the document](#) detailing for each PAI how it is embedded within the scoring methodology.

The analysis realized by the BNP Paribas as an insurance advisor, allows the classification, when possible, of unit-linked according to IDD definition of 'sustainable preferences'.

⁵ SFDR Delegated regulation art.11

Section 5

Information on Transparency of remuneration policy in relation to the integration of sustainability risks

BNP Paribas S.A. societal commitment involves promoting sustainability and limiting sustainability risks.

To promote employee involvement in its subjects, BNP Paribas S.A. has for several years integrated sustainability risks into its compensation policies, in particular through CSR indicators representative of the four pillars of the Group's policy and impacting in part of the annual variable compensation for both the Group executive directors and the beneficiaries of the Group three-year fidelity plan.

For Group executive directors, CSR components (including climate and environmental criteria) are taken into account in the calculation of their annual variable compensation for 15% of the global amount awarded. Among these 15%:

- 5% is assessed by the Board of directors depending on achievements and key developments around a line of action focused on climate and social challenges;
- 5% is assessed by the market through the positioning of BNP Paribas in the top quartile of the Banks sector in the extra-financial performance ranking of FTSE and S&P Global CSA;
- 5% is aligned with the achievement of the CSR objectives of the Group CSR Dashboard (used for the Group's key employees retention plan, see hereafter), in particular, in terms of:
 - Greenhouse gas emissions in tons of CO₂ equivalent / full-time employees (2025 objective: 1.85 teq CO₂/FTE);
 - Amount of the support enabling clients to transition to a low carbon economy (2025 objective: €200bn);
 - Amount of financing to companies contributing to protect terrestrial and marine biodiversity (2025 objective: €4bn).

In addition to this CSR component, compensation of Group executive directors also embeds a qualitative criterion for 10% that is assessed by the Board of directors taking into account social and environmental issues.

For beneficiaries of the Group three-year fidelity plan known as the Group Sustainability and Incentive Scheme (attributed to more than 9,000 key Group employees in 2024), the payment of 20% of the amount awarded is subject to the achievement of the objectives of the Group CSR Dashboard (same as climate and environmental objectives as the ones described above for Group executive directors).



In addition, the profit-sharing agreement for BNP Paribas SA, BNP Paribas Financial Markets includes CSR criteria:

- one on reduction of greenhouse gas emissions per employee (energy consumption from buildings and business trips);
- one on number of solidarity hours performed by employees (#1MillionHours2Help).

Moreover, the BNP Paribas Group's remuneration principles require that the variable compensation of financial market participants and financial advisors does not lead them to take excessive sustainability risks through the investments and investment advice they are required to give to their clients on financial products governed by the European SFDR regulation. These elements must be taken into account for the persons concerned in the annual performance appraisal process.

At the same time, BNP Paribas S.A. compensation policy aims to promote professional behaviour in line with the principles set out in the Group's Code of Conduct, any breach of these principles being taken into account in the assessment of individual performance for all employees, and in particular for the Group's regulated populations. A Conduct objective is assigned to all staff members within the Group.

This Code of Conduct sets out the Group's rules and requirements to support its aspirations to contribute to responsible and sustainable global development and to have a positive impact on society at large.

This involvement rests on three pillars: (i) promoting respect for human rights, (ii) protecting the environment and combating climate change, and (iii) acting responsibly in public representation.